

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
SYLVIA IRVIN  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
Sylvia\_Irvin@fd.org

6 Attorney for Andre Johnson

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**  
9

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 ANDRE JOHNSON,  
14 Defendant.

Case No. 2:18-cr-142-JCM-VCF

**STIPULATION TO CONTINUE**  
**SENTENCING**  
(First Request)

16 It is hereby stipulated and agreed to by and between United States Attorney Nicholas  
17 A. Trutanich and Assistant United States Attorney Randolph J. St. Clair and Assistant United  
18 States Attorney Kimberly A. Sokolich, counsel for the United States of America, and Federal  
19 Public Defender Rene L. Valladares and Assistant Federal Public Defender Sylvia Irvin,  
20 counsel for Defendant Andre Johnson, that the Sentencing Hearing scheduled for January 8,  
21 2021, at 10:30am, be vacated and reset to March 26, 2021, at 11:00am, or to a date and time  
22 convenient to this Court.

23 The Stipulation is entered into for the following reasons:

24 1. This is a joint request by counsel for the Defendant Andre Johnson and counsel  
25 for the Government.  
26

1           2.       The additional time requested by this Stipulation is reasonable pursuant to  
2 Federal Rule of Criminal Procedure 32(b)(2), which states that the “court may, for good cause,  
3 change any time limits prescribed in this rule.”

4           3.       Counsel request this additional time in order to allow adequate time to continue  
5 to prepare for the sentencing hearing.  
6

7           4.       Defense counsel also asks for this continuance on behalf of Mr. Johnson who  
8 would like his family to be able to attend the sentencing hearing whether by phone, video, or in  
9 person, and they are unable to attend the hearing as currently scheduled.  
10

11           5.       The Defendant is in custody and does not object to the continuance.

12           6.       The parties agree to the continuance.

13           7.       This is the first stipulation to continue the sentencing hearing.  
14

15           DATED this 6th day of January, 2021.

16  
17       RENE L. VALLADARES  
18       Federal Public Defender

          NICHOLAS TRUTANICH  
          United States Attorney

19       By: Sylvia A. Irvin

          By: Randolph J. St. Clair

20       SYLVIA A. IRVIN  
21       Assistant Federal Public Defender

          RANDOLPH J. ST. CLAIR  
          Assistant United States Attorney

22                   By: Kimberly A. Sokolich

23                   KIMBERLY A. SOKOLICH  
24                   Assistant United States Attorney  
25  
26

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ANDRE JOHNSON,

7 Defendant.

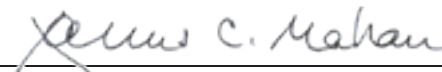
Case No. 2:18-cr-142-JCM-VCF

8 **ORDER**

9  
10 Based on the Stipulation of counsel, and good cause appearing,

11 **IT IS THEREFORE ORDERED** that the Sentencing Hearing currently set for January  
12 8, 2021, at 10:30AM, be vacated and continued to **March 26, 2021, at 11:00AM.**

13  
14 DATED January 6, 2021.

15   
16 \_\_\_\_\_  
17 UNITED STATES DISTRICT JUDGE